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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

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This Document Relates to:  
  
ALL ACTIONS

**STIPULATION AND [PROPOSED]  
ORDER RE PLAINTIFFS'  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL EXHIBITS IN SUPPORT  
OF PLAINTIFFS' *CONSOLIDATED EX  
PARTE* APPLICATION FOR  
APPOINTMENT OF GUARDIANS *AD  
LITEM***

Pursuant to Civil Local Rule 7-12, Plaintiffs and Meta Platforms, Inc., Facebook Holdings, LLC, Facebook Operations, LLC, Facebook Payments, Inc., Facebook Technologies, LLC, Instagram LLC, and Siculus Inc. (“Meta Entities”); Snap Inc.; TikTok Inc. and ByteDance Inc. (“TikTok Entities”); and YouTube, LLC, Alphabet Inc., and Google LLC (“Google Entities”) (collectively “Defendants”) (together the “Parties”) by and through their counsel of record hereby stipulate as follows:

WHEREAS, the Plaintiffs seek to file under seal the individual *Ex Parte* Applications for Appointment of Guardians *Ad Litem*, which are Exhibits 1 to 75 to the declaration of Jennie Lee Anderson in Support of Plaintiffs’ Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Applications”);

WHEREAS, the Parties have met and conferred regarding the [Proposed] Order Re Plaintiffs’ Administrative Motion to File Under Seal Exhibits in Support of Plaintiffs’ Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“[Proposed] Order”);

WHEREAS, Defendants do not take any position at this time as to whether Plaintiffs have satisfied their evidentiary burden to support sealing of the Applications; and

WHEREAS the Defendants will stipulate to the entry of the [Proposed] Order, but do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause.

The Parties hereby stipulate and submit to the Court, the attached [Proposed] Order Re Plaintiffs’ Administrative Motion to File Under Seal Exhibits in Support of Plaintiffs’ Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*.

Dated: February 28, 2023

Respectfully submitted,

LIEFF CABRASER HEIMANN  
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and Alphabet Inc.*

**SIGNATURE CERTIFICATION**

Pursuant to Civ. L.R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

Dated: February 28, 2023

/s/ Jennie Lee Anderson

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